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December 1, 2023

Hon. Lewis J. Liman, U.S.D.J.
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Via ECF

**Re: 689 Eatery Corp., etc. et ano. v. City of New York, et al.,
Docket No. 02 CV 4431 (LJL) (“Action No. 1”)**

**59 Murray Enterprises, Inc. etc., et ano. v. City of New York, et al.,
Docket No. 02 CV 4432 (LJL) (“Action No. 2”)**

**Club at 60th Street, et al. v. City of New York
Docket No. 02 CV 8333 (LJL) (“Action No. 3”)**

**336 LLC, etc, et al. v. City of New York
Docket No. 18 CV 3732 (LJL) (“Action No. 4”)**

Dear Judge Liman:

We represent the plaintiffs in Action No. 2, and write on behalf of all counsel to consent to the formal consolidation of the above referenced actions. Specifically, in response to Your Honor’s request during Wednesday’s argument, all parties consent to consolidation of these four cases and that any evidence filed in only one case can be considered and is binding on all the parties in all of the other cases.

In this regard, counsel call the attention of the Court to the Order (Pauley, J.) entered May 16, 2018 (Doc. No. 61 in Action No. 1), setting forth procedures for the filing of documents in Actions Nos. 1, 2 and 3, as modified as to Action No. 4 by the Order entered November 17, 2018 (Pauley, J.) (Doc. No. 74 in Action No. 1), and request that any Consolidation Order now entered by the Court either confirm if the procedures set forth in

ZANE AND RUDOFISKY

the May 16, 2018 Order should continue to be followed, or if the parties should follow any other procedures.

Respectfully,
Edward S. Rudofsky
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Cc: All Counsel (Via E-Filing)